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Attorneys for Defendant
i2 Technologies, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAP AKTIENGESELLSCHAFT, a
German corporation,

Plaintiff,

vs.

i2 TECHNOLOGIES, INC., a Delaware
corporation,

Defendant.

CASE NO. 3:07-cv-04187-SBA

**DEFENDANT AND COUNTERCLAIMANT
i2 TECHNOLOGIES, INC.'S INITIAL
DISCLOSURES PURSUANT TO RULE 26
OF THE FEDERAL RULES OF CIVIL
PROCEDURE**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and the Rule
26(f) report submitted on November 26, 2007, Defendant and Counter Claimant i2 Technologies,

Inc. ("i2") provides the following initial disclosures in this action based on information currently available to i2. i2 reserves the right to supplement its initial disclosures, including its identification of persons with relevant knowledge, upon receipt of SAP's infringement contentions. SAP's amended complaint accuses i2's Six Solutions products of infringement, which encompasses almost every subcomponent of i2's supply chain planning software. These initial disclosures are made without waiving i2's right to object to any discovery request or other proceeding concerning the subject matter of these disclosures based on competency, privilege, relevance, materiality, hearsay, or any other proper ground for objection.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:

The following individuals are persons having knowledge of relevant facts. Each individual listed below should be contacted through counsel of record for i2. i2 incorporates by reference the list of Plaintiff's representative with knowledge of relevant facts identified in Plaintiff's Initial Disclosures. i2's investigation is continuing and it may, in the future, learn the identity of additional persons who have knowledge of relevant facts.

Name and Address and Telephone Number	Subject(s)
Waylin Debetaz i2 Fellow i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Debetaz is a Chief Architect for i2 UI infrastructure. He is familiar with designing frameworks for building scalable and rich user interfaces.
Mark Belonga Distinguished Member of Technical Staff i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Belonga is a Chief Architect for i2 studio, the design environment for i2 platform. Mr. Belonga has experience in building out UI infrastructures.

Name and Address and Telephone Number	Subject(s)
Sanjiv Jivan Advanced Member of Technical Staff i2 Technologies US, Inc. 4 Cambridge Center 4th Floor Cambridge, MA 02142 (617) 761-2900	Mr. Jivan is an engineer who is familiar with i2's UI technology.
Pravin Rangachari Senior Director, Product Management i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Rangachari is the Director for the i2 Execution, Collaboration & Visibility product suite. He is familiar with the development of these products within the suite, including Supply Chain Visibility.
Arjun Rajagopalan Senior Manager, Product Manager and Development i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Rajagopalan is the Development Manager for Supply Chain Visibility. Mr. Rajagopalan is familiar with the functionality of this product line.
Sanjiv Sidhu* i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Sidhu is the founder of i2. He is familiar with the corporate and product history of i2. Mr. Sidhu is also familiar with the history, development, marketing and implementation of the i2 product lines.
Giridhar Tandri Vice-President of Development i2 Technologies US, Inc. 11701 Luna Road Dallas, TX 75234 (469) 357-1000	Mr. Tandri is familiar with the development and functionality of the Supply Chain Visibility product.

B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possess, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:

i2 has collected documents, data, electronically stored information, compilations and tangible things, of which it currently has knowledge, and that are in the possession, custody or control that i2 may use to support its claims or defenses. i2's investigation is continuing and it

1 may, in the future, locate additional documents, electronically stored information, or tangible
2 things that it may use to support its claims or defenses.

3 1. Categories

4 There are numerous categories of documents collected by i2 such as:

- 5 • Detailed technical documents regarding the structure, functionality and
6 development of the accused products;
- 7 ▪ Manuals for the accused products;
- 8 ▪ Patents-in-Suit;
- 9 ▪ Information regarding the marketing of the accused products;
- 10 ▪ Information regarding the sales of accused products;
- 11 ▪ Prior art; and
- 12 ▪ Copies of the accused products.

13 2. Location

14 These documents have been collected from i2 offices in Dallas, Texas. These
15 documents are at the i2 office in Dallas, Texas and at the office of counsel for i2.

16 3. Production

17 i2 will produce relevant, responsive, non-privileged documents in accordance with
18 the proposed schedule submitted in the Rule 26(f) report on November 26, 2007 and after an
19 appropriate protective order is entered in this case.

20 **C. A computation of any category of damages claimed by the disclosing**
21 **party, making available for inspection and copying as under Rule 34 the documents or**
22 **other evidentiary material, not privileged or protected from disclosure, on which such**
23 **computation is based, including materials bearing on the nature and extent of the injuries**
24 **suffered.**

25 i2 is not seeking damages in this case.

26 **D. For inspection and copying as under Rule 34 any insurance agreement**
27 **under which any person carry on an insurance business may be liable to satisfy part or all**
28 **of a judgment entered in this action or to indemnify or reimburse for payments made to**

1 **satisfy the judgment.**

2 i2 is not aware of any information in its possession, custody, or control responsive
3 to this request.

4
5 Dated: November 30, 2007

PAUL, HASTINGS, JANOFSKY & WALKER LLP

6
7 By: /s/ Jason K. Sonoda
Jason K. Sonoda

8
9 OF COUNSEL:

10 MCKOOL SMITH, P.C.

11 Theodore Stevenson, III (*pro hac vice* application
pending)

12 Scott W. Hejny (*pro hac vice* application pending)

Luke F. McLeroy (*pro hac vice* application pending)

13 Attorneys for Defendant
14 i2 Technologies

PROOF OF SERVICE BY ELECTRONIC MAIL

I am a citizen of the United States and employed in San Francisco County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 55 Second Street, Twenty-Fourth Floor, San Francisco, California 94105-3441.

On November 30, I served a true and correct copy of

**DEFENDANT AND COUNTERCLAIMANT i2 TECHNOLOGIES, INC.'S
INITIAL DISCLOSURES PURSUANT TO RULE 26 OF THE FEDERAL RULES OF
CIVIL PROCEDURE**

☒ **VIA ELECTRONIC MAIL:**

Pursuant to the operation of the U.S. District Court for the Northern District of California E-Filing system, all parties above have been served via e-mail; per Local Rule 5-4 and General Order 45.

as follows:

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on November 30, 2007, at San Francisco, California.

By: /s/ Carol Alexander
Carol Alexander

LEGAL_US_W # 57668373.1